

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION

JAN 24 2017
JAMES W. McCORMACK, CLERK
By: *[Signature]*
DEP CLERK

DAVID A. STEBBINS

PLAINTIFF

VS.

CASE NO. 4:16CV00545-JM

STATE OF ARKANSAS, ARKANSAS
REHABILITATION SERVICES, AND AMY JONES

DEFENDANTS

RESPONSE TO [037] MOTION TO STAY DISCOVERY AND
RESPONSE TO [039] MOTION TO STAY 26(f) DEADLINES

Comes now, *pro se* Plaintiff David A. Stebbins, who hereby submits the following Response to both the Defendant's Motions to Stay (Doc. 37 and 39).

1. The claims in the Complaint are not barred as a matter of law. As such, granting the requested stay would only encourage the frivolous defenses they have raised. As I have demonstrated, their claims of immunity are frivolous due to them conflicting with clearly-established SCOTUS precedent, and therefore, to even so much as grant a stay of proceedings for this reason would effectively mean that they have succeeded in at least causing a delay, which is expressly forbidden under Fed.R.Civ.P. 11(b).

2. Therefore, both Motions to Stay should be denied.

Wherefore, premises considered, I request that the Motions to Stay and Motion to Dismiss be denied, the Motion for Partial Summary Judgment, Motion for Contempt, and Motion for Sanctions all be granted, costs incurred be awarded, and any other relief to which I may be entitled. So requested on this, the 16th day of January, 2017.



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